

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE**

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IN RE: **RONDA F. LEWIS**

CASE NO. **13-24175-D**  
CHAPTER **13**

Debtor(s)

**RONDA F. LEWIS**

Plaintiff(s)

vs.

Adv. Proc. No.

**MEMPHIS VAMC**

Defendant(s)

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**COMPLAINT FOR TURNOVER OF PROPERTY/FUNDS TO THE ESTATE**

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The Debtor, as Plaintiff, brings this complaint for turnover of property/funds to the estate pursuant to FED. R. BANKR. P. 7001(1) and 11 U.S.C. § 542(a) to recover funds in the amount of \$1,183.00 as to the offset of Debtor's 2013 tax return.

The Court has jurisdiction of this case under the provisions of 28 U.S.C. §§ 1334(b) and 157(a). By virtue of 28 U.S.C. § 157(b)(2)(E), this is a core proceeding.

Under the particular facts and circumstances, and applicable law, the Plaintiff is entitled to possession of the above-described property/funds of the estate for "use" as contemplated in 11 U.S.C. § 363.

WHEREFORE, the Plaintiff respectfully requests that an expedited hearing be set to consider the requested relief, and that the court enter its order directing the Defendant to refund the above said funds to Debtor.

Attorney for the Plaintiff(s)  
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**CERTIFICATE OF SERVICE**

The undersigned party, attorney for a party, or agent hereby certifies that the above Complaint will be promptly served, postage prepaid, or hand-delivered to all interested parties listed herein below. **Date of Service March 5, 2014.**

/s/ Sidney A. Feuerstein  
Attorney for Debtor(s)

cc:  
Debtor (USPS)  
Trustee (email)  
Memphis VAMC (USPS)  
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